

HUSSON

UNIVERSITY

School of Pharmacy

January 4, 2011

Carole Cifrino
Department of Environmental Protection
17 State House Station
Augusta, Maine 04333

Dear Ms. Cifrino,

I am writing in response to the request for comments regarding the *Implementing Product Stewardship in Maine* report. As a pharmacist and Dean of a School of Pharmacy, I am specifically interested in commenting on the pharmaceutical waste aspect of the report. I certainly understand that the disposal of unused medication is a major issue for a variety of reasons, including environmental, as well as with regard to illegal diversion and subsequent use. Because of this, the school has donated a significant amount of time and effort by faculty, students and myself towards reducing wastes and studying what precisely is being wasted.

While I applaud the Departments efforts and acknowledgment of pharmaceutical waste as being a problem, the report's recommendations in this area are somewhat premature. This is due to the federal government's recent activities regarding this issue, and subsequent regulatory actions that will be forthcoming in the near future. These regulations will likely be critical for all local, regional, state and/or national programs that will be operational after they have been adopted.

Therefore, I strongly urge you to postpone any recommendations concerning pharmaceutical waste until after the federal government has an opportunity to address this issue. Creating a state-wide system that will likely need adjusting, modifying or even dismantling in the near future seems to be inefficient and will be, at the very least, confusing to the public.

If you would like to discuss this issue any further, or in any other way take advantage of the expertise within the School of Pharmacy at Husson University, do not hesitate to contact me. I can be reached by phone at 207-941-7122 or via email at LarsonR@Husson.edu.

Sincerely,



Rodney A. Larson, Ph.D., R.Ph.
Founding Dean